

Exhibit 2

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LUIS GOMEZ-ECHEVERRIA, ET AL.,
Plaintiffs/Counter-Defendants,
v.

Case No. 22-CV-314
Hon. Jane M. Beckering

PURPOSE POINT HARVESTING LLC,
ET AL.,
Defendants/Counter-Plaintiffs.

MIGRANT LEGAL AID Teresa Hendricks (P46500) Benjamin O'Hearn (P79252) Molly Spaak (84730) Attorneys for Plaintiffs/Counter-Defendants 1140 Fuller Ave., Ne Grand Rapids MI 49503 616-454-5055	AVANTI LAW GROUP, PLLC Robert Anthony Alvarez (P66954) Attorney for Defendants/Counter-Plaintiffs 600 28th St. SW Wyoming, MI 49509 616-257-6807
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DEFENDANTS' RULE 26 INITIAL DISCLOSURES

I. Rule 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information Relevant to Disputed Facts:

The following is a list of the individuals known to Defendant(s) at this time who are likely to have discoverable information relevant to the disputed facts alleged particularly in the pleadings, with each individual's name, address (where available), phone number (where available), and subjects of relevant information possessed.

A. Emilto Moreno Gomez,
% Avanti Law Group, PLLC
600 28th St. SW
Wyoming, MI 49509
616-257-6807

Defendant possesses information relevant to Plaintiffs' employment, including but not limited to recruitment, hire, transfer, compensation, nature of work performed, the general nature of Defendants' operations, policies, job duties, and the events surrounding the incidents that are the subject of this litigation.

B. Lucille Jean Moreno
% Avanti Law Group, PLLC
600 28th St. SW
Wyoming, MI 49509
616-257-6807

Defendant possesses information relevant to Plaintiffs' employment, including but not limited to recruitment, hire, transfer, compensation, nature of work performed, the general nature of Defendants' operations, policies, job duties, and the events surrounding the incidents that are the subject of this litigation.

C. Purpose Point Harvesting LLC
% Avanti Law Group PLLC
600 28th St. SW
Wyoming MI, 49509

Officers, members, directors, and employees of Defendant possess relevant information related to the day-to-day operation of the business including; hiring and recruitment practices, compensation history of Plaintiff(s), Plaintiff's job duties and responsibilities, days and hours worked by Plaintiff(s), and the events surrounding the incidents that are the subject of this litigation. Officers, members, directors, and employees of Defendant also possess information related to other relevant matters such as the policies in force at the time period that is the subject of this litigation and the enforcement of those policies.

D. All H2-A workers who were employed by the Defendants from 2017, 2018, 2019.

E. Rubicelia Berumen

F. Ramon Berumen

G. Julio Cesar Gomez Moreno

H. Darwin Fuentes

I. Luis Gomez-Castro

J. Armando Diaz Jr.

K. Aaron Colon

L. All individuals To-Be Named in Plaintiff's Rule 26 Disclosures.

M. This list does not constitute Defendant's final witness list. Defendants reserve the right to

add witnesses as appropriate as they become known during the course of discovery up to the

time of trial.

II. Rule 26(a)(1)(A)(ii): Documents Relevant to Disputed Facts. Relevant documents in Defendant's possession to be disclosed, and to be produced only upon request, are described as follows:

- A. Paystubs for Defendant's Employees;
- B. Time Cards for Defendant's Employees;
- C. H-2A Worker Obligation to Depart the United States for Defendant's Employees;
- D. Drug and Alcohol Policy for Defendant's Employees;
- E. Agricultural Work Agreement for Defendant's Employees;
- F. Tax Forms for Defendant's Employees;
- G. Employee forms of Identifications;
- H. Workers Compensation Forms and Incident Reports;
- I. H-2A Information & Enrollment Package;
- J. Audio recording and Text messages between the United States Department of Labor and Defendant's Employees;

Copies of all documents are located at Avanti Law Group PLLC, 600 28th St. Sw. Wyoming MI 49509.

III. Rule 26(a)(1)(A)(iii): Computation of Damages.

- A. Defendants have incurred \$350,000 in business losses caused by the Plaintiffs' actions in lost revenue.
- B. Defendants also seek to recover their costs and reasonable attorney fees as permitted under the law.

IV. Rule 26(a)(1)(B): Privileged matter being withheld by Defendant(s).

- A. Notes and memoranda prepared by Defendant's attorneys and legal staff reflecting confidential information provided by Defendant's to their attorneys (through written correspondence, telephone conversation or in-person consultation) regarding the matters at issue in this case. Privileges asserted: attorney/client privilege, attorney work product and/or common interest privilege.
- B. Notes and memoranda prepared by Defendant's attorney and representatives containing their mental impressions, conclusions, opinions, or legal theories concerning this litigation. Privileges asserted: attorney/client privilege, attorney work product.
- C. Correspondence between Defendant's attorney and Defendants regarding this case. Privileges asserted: attorney/client privilege, attorney work product and/or common interest privilege.

V. Rule 26(a)(2): Disclosure of Expert Testimony.

Persons to give expert testimony under Rules 702, 703, 705 of the Federal Rules of Evidence are yet to be determined as discovery is not yet complete and the decision as to whether an expert will be necessary has not been made. Defendants reserve the right to identify an expert and use their testimony at trial should it become necessary.

Dated: June 2, 2023

By: /s/Robert Anthony Alvarez
Robert Anthony Alvarez (P66954)
Attorney for Defendants
Avanti Law Group, PLLC
600 28th Street SW
Wyoming, MI 49509
(616) 257-6807
ralvarez@avantilaw.com